

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

UNITED STATES OF AMERICA,
STATE OF NORTH CAROLINA,
STATE OF CALIFORNIA,
STATE OF COLORADO,
STATE OF CONNECTICUT,
STATE OF ILLINOIS,
COMMONWEALTH OF
MASSACHUSETTS,
STATE OF MINNESOTA,
STATE OF OREGON, and
STATE OF TENNESSEE,

Plaintiffs,

v.

REALPAGE, INC.,
CAMDEN PROPERTY TRUST,
CORTLAND MANAGEMENT, LLC,
GREYSTAR MANAGEMENT
SERVICES, LLC,
LIVCOR, LLC,
PINNACLE PROPERTY
MANAGEMENT SERVICES, LLC,
and
WILLOW BRIDGE PROPERTY
COMPANY, LLC

Defendants.

Case No. 1:24-cv-00710-WO-JLW

**CUSTOMER DEFENDANTS' NOTICE OF
SUPPLEMENTAL AUTHORITY**

CUSTOMER DEFENDANTS' NOTICE OF SUPPLEMENTAL AUTHORITY

The Customer Defendants in this action provide notice to the Court of supplemental authority (Exhibit 1) relevant to their pending joint and individual motions to dismiss. ECF

Nos. 129, 131, 132, 134, 136, and 138. The Customer Defendants relied upon the district court opinion that the Ninth Circuit affirmed, *Gibson v. Cendyn Group, LLC*, 2024 WL 2060260, at *1, *3, *4, *6, *7, *9 (D. Nev. May 8, 2024), throughout their pending joint motion to dismiss.

Respectfully submitted,

August 25, 2025

/s/ Caroline M. Gieser

Caroline M. Gieser
(NC Bar No.: 51610)
Shook, Hardy & Bacon LLP
1230 Peachtree St., Ste. 1200
Atlanta, GA 30309
Tel: (404) 867-6013
cgieser@shb.com

Ryan M. Sandrock
(LR 83.1(d) Counsel)
Shook, Hardy & Bacon LLP
555 Mission Street, Suite 2300
San Francisco, CA 94105
Tel: (415) 544-1900
rsandrock@shb.com

Laurie A. Novion
(LR 83.1(d) Counsel)
Shook, Hardy & Bacon LLP
2555 Grand Blvd.
Kansas City, MO 64108-2613
Tel: (816) 474-6550
lnovion@shb.com

Maveric Ray Searle
(LR 83.1(d) Counsel)
Meghan E.H. Keeley
(LR 83.1(d) Counsel)
Shook, Hardy & Bacon LLP
111 S. Wacker Dr., Ste. 4700
Chicago, IL 60606
Tel: (312) 704-7700
msearle@shb.com
mkeeley@shb.com

*Attorneys for Defendant
Camden Property Trust*

/s/ Eric Steven Goodheart

Eric Steven Goodheart
North Carolina Bar No. NC-53476
DLA PIPER LLP (US)
4141 Parklake Avenue, Suite 300
Raleigh, North Carolina 27612
eric.goodheart@us.dlapiper.com
Tel: (919) 786-2012
Fax: (919) 591-0412

Gregory J. Casas
(LR 83.1(d) Counsel)
DLA PIPER LLP (US)
303 Colorado Street, Suite 3000
Austin, Texas 78701
greg.casas@us.dlapiper.com
Tel: (512) 457-7290
Fax: (512) 721-2390

Carsten M. Reichel
(LR 83.1(d) Counsel)
DLA Piper LLP (US)
500 Eighth Street, NW
Washington, DC 20004
carsten.reichel@us.dlapiper.com
Tel: (202) 799-4640
Fax: (202) 799-5640

Becky L. Caruso
(LR 83.1(d) Counsel)
DLA Piper LLP (US)
51 John F. Kennedy Parkway,
Suite 120
Short Hills, NJ 07078-2704
becky.caruso@us.dlapiper.com
Tel: (973) 520-2550
Fax: (973) 520-2551

*Attorneys for Willow
Bridge Property Company, LLC*

/s/ Michael Montecalvo

Michael Montecalvo
N.C. Bar No. 24943
Aaron J. Horner
N.C. Bar No. 56335
WOMBLE BOND DICKINSON (US) LLP
One West Fourth Street
Winston-Salem, NC 27101
Telephone: (336) 721-3600
Facsimile: (336) 721-3660
aj.horner@wbd-us.com
michael.montecalvo@wbd-us.com

Kenneth Reinker
D.C. Bar No. 999958
Jeremy Calsyn
D.C. Bar No. 467737
Cleary Gottlieb Steen and
Hamilton LLP
2112 Pennsylvania Avenue, NW
Washington, D.C. 20037
Telephone: (202) 974-1522
Facsimile: (202) 974-1999
E-Mail: jcalsyn@cgsh.com
E-Mail: kreinker@cgsh.com

Joseph Kay
N.Y. Bar No. 5410055
Cleary Gottlieb Steen and
Hamilton LLP
One Liberty Plaza
New York, NY 10006
Telephone: (212) 225-2745
Facsimile: (212) 225-3999
E-Mail: jkay@cgsh.com

*Attorneys for Defendant
Pinnacle Property Management
Services, LLC*

/s/ Kearns Davis

Kearns Davis, NC Bar. No. 22014
Brooks, Pierce, McLendon,
Humphrey & Leonard
2000 Renaissance Plaza
230 North Elm Street
Greensboro, NC 27401
Telephone: 336-373-8850
Facsimile: 336-378-1001
Email:kDavis@brookpierce.com

David Kiernan
(LR 83.1(d) Counsel)
JONES DAY
555 California Street
26th Floor
San Francisco, CA 94104
(415) 875-5745
dkiernan@jonesday.com

Michelle K. Fischer
(LR 83.1(d) Counsel)
JONES DAY
901 Lakeside Avenue
Cleveland, OH 44114
(216) 586-7096
mfischer@jonesday.com

Peter J. Schwingler
(LR 83.1(d) Counsel)
JONES DAY
90 South Seventh Street
Suite 4950
Minneapolis, MN 55402
(612) 217-8866
pschwingler@jonesday.com

*Attorneys for Defendant
LivCor, LLC*

CERTIFICATE OF SERVICE

This is to certify that on August 25, 2025, a copy of the foregoing was filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/Michael Montecalvo

Michael Montecalvo